

[COUNSEL LISTED ON SIGNATURE PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LASER DESIGN INTERNATIONAL, LLC and
NORWOOD OPERATING COMPANY,

Plaintiffs,

v.

BJ CRYSTAL, INC., a California corporation;
CRYSTAL MAGIC, INC., a Florida
corporation; U.C. LASER, INC., a New Jersey
corporation; VITRO LASER GROUP U.S.A.,
INC., a Nevada corporation; JIMAC
MARKETING, INC., a Canadian corporation;
CONCORD INDUSTRIES, INC., a Connecticut
corporation; CERION GMBH, a German limited
liability company; CRYSTAL CAPTURE INC.,
a Texas corporation; CRYSTAL CAPTURE
INTERNATIONAL, LLC, a Nevada limited
liability company; G.W. PARTNERS
INTERNATIONAL, INC., a California
corporation; VITRO LASER GMBH, a German
limited liability company; VITRO
INTERNATIONAL, LLC, a Nevada limited
liability company; VITRO USA, LLC, a Nevada
limited liability company; MERITAGE
GRAPHICS, INC., a Nevada corporation;
CRYSTAL LASER CONCEPTS, LTD., a
Nevada limited liability company; 3DLI, Inc., a
Nevada corporation; ART GOLDMAN; SCOTT
STANKO; OTHMAR VAN DAM; and DOES
1-19,

Defendants.

AND RELATED COUNTERCLAIMS

Lead Case No. C 03-1179 JSW (MEJ)
Consolidated with No. C 03-3905 JSW

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING A COURT-
ORDERED DEADLINE FOR DEPOSITION
OF DEFENDANT CRYSTAL MAGIC, INC.**

1 Plaintiffs, Laser Design International, LLC and Norwood Operating Company
2 (“Plaintiffs”), and Defendant, Crystal Magic, Inc., (“Crystal Magic”), by their undersigned
3 counsel, hereby submit the following Stipulation Modifying a Court-Ordered Deadline for the
4 Deposition of Defendant Crystal Magic, Inc. By and through counsel, Plaintiffs and Crystal
5 Magic stipulate as follows:

6 1. By stipulation and court order, attached as Exhibit A, Crystal Magic was required to
7 appear in the offices of plaintiffs’ counsel for a deposition on or before March 31, 2006.

8 2. However, Crystal Magic has stated that its designated witness is unable to appear for
9 this deposition in the month of March and Crystal Magic has therefore requested a modification
10 of the deadline and an extension of time. The parties and their attorneys have agreed that April
11 11, 2006 is a mutually convenient date for the deposition to occur.

12 3. Accordingly, for the convenience of Crystal Magic, the undersigned hereby stipulate
13 that the deposition of Crystal Magic may occur on April 11, 2006.

14 Dated: March 27, 2006

15 COOLEY GODWARD LLP

16
17 By: _____/s/_____
18 Brian E. Mitchell
19 Attorneys for Plaintiffs
Laser Design International, LLC
and Norwood Operating Company

20 Dated: March 27, 2006

21 PERKINS COIE, LLP

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23 By: _____/s/_____
24 Scott Eads
25 Attorneys for Defendants
26 BJ Crystal, Inc., Crystal Magic, Inc., Crystal
Capture, Inc., Jimac Marketing, Inc., Cerion
27 GmbH, Concord Industries, Inc., and Vitro
28 Laser GmbH

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 28, 2006

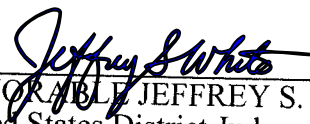
By: 
HONORABLE JEFFREY S. WHITE
United States District Judge

EXHIBIT A

1 [COUNSEL LISTED ON SIGNATURE PAGE]
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10 LASER DESIGN INTERNATIONAL, LLC and
11 NORWOOD OPERATING COMPANY,

12 Plaintiffs,

13 v.

14 BJ CRYSTAL, INC., a California corporation;
15 CRYSTAL MAGIC, INC., a Florida
16 corporation; U.C. LASER, INC., a New Jersey
17 corporation; VITRO LASER GROUP U.S.A.,
18 INC., a Nevada corporation; JIMAC
19 MARKETING, INC., a Canadian corporation;
20 CONCORD INDUSTRIES, INC., a Connecticut
21 corporation; CERION GMBH, a German limited
22 liability company; CRYSTAL CAPTURE INC.,
23 a Texas corporation; CRYSTAL CAPTURE
24 INTERNATIONAL, LLC, a Nevada limited
25 liability company; G.W. PARTNERS
INTERNATIONAL, INC., a California
corporation; VITRO LASER GMBH, a German
limited liability company; VITRO
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liability company; VITRO USA, LLC, a Nevada
limited liability company; MERITAGE
GRAPHICS, INC., a Nevada corporation;
CRYSTAL LASER CONCEPTS, LTD., a
Nevada limited liability company; 3DLI, Inc., a
Nevada corporation; ART GOLDMAN; SCOTT
STANKO; OTHMAR VAN DAM; and DOES
1-19,

26 Defendants.

27 AND RELATED COUNTERCLAIMS
28

Lead Case No. C 03-1179 JSW (MEJ)
Consolidated with No. C 03-3905 JSW

**STIPULATION AND [PROPOSED]
ORDER ALLOWING AMENDMENT OF
DEFENDANT CRYSTAL MAGIC, INC.'S
ANSWER TO SECOND AMENDED
COMPLAINT**

**STIPULATION AND [PROPOSED] ORDER
C 03 01179 JSW (MEJ)**

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1 By and through counsel, Plaintiffs and defendant Crystal Magic, Inc. ("Crystal Magic")
2 stipulate as follows:

3 1. Crystal Magic may file an amendment to its Answer to Plaintiffs' Second Amended
4 Complaint, in the form of the attached Exhibit A, to add a Sixth Affirmative Defense.

5 Correspondingly, Crystal Magic agrees to provide certain discovery, relating to this defense, as
6 set forth herein.

7 2. Crystal Magic will provide responses and objections to Document Requests, in the
8 form of the attached Exhibit B, and responsive, non-privileged documents will be produced, and
9 privilege documents will be placed on a privilege log, within 30 days.

10 3. Crystal Magic will provide verified responses and objections to special interrogatories,
11 in the form of Exhibit C, within 30 days. These special interrogatories will not count towards the
12 limit on interrogatories, as that limit relates to interrogatories that are served on all of the
13 defendants in this case.

14 4. Crystal Magic will provide a representative for a deposition, pursuant to Rule 30(b)(6)
15 of the Federal Rules of Civil Procedure, on the topic of its Sixth Affirmative Defense. This
16 deposition will take place in the offices of Cooley Godward LLP, San Francisco, California, prior
17 to earlier of (1) the next mediation for this case or, (2) this case's discovery cut-off date.

18 5. Crystal Magic will file an amendment to its Answer to Plaintiffs' Second
19 Amended Complaint, in the form of the attached Exhibit A, within 5 days from the date of entry
20 of this Stipulation and ~~Proposed~~ Order by the Court.

21 Dated: January 30, 2006

22 COOLEY GODWARD LLP

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25 By: _____/s/
26 Brian E. Mitchell
27 Attorneys for Plaintiffs
28 LASER DESIGN INTERNATIONAL, LLC
and NORWOOD OPERATING COMPANY

STIPULATION AND ~~PROPOSED~~ ORDER
C 03 01179 JSW (MEJ)

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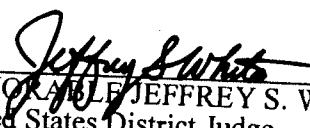
1 Dated: January 30, 2006

2 PERKINS COIE LLP

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4
5 By: /s/
6 Kenneth B. Wilson
7 Attorneys for Defendants
8 BJ Crystal, Inc., Crystal Magic, Inc., Crystal
9 Capture, Inc., Concord Industries, Inc.,
10 Jimac Marketing, Inc., U.C. Laser, Inc.,
11 Cerion GmbH, Vitro Laser GmbH and
12 Meritage Graphics, Inc.

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

14 Dated: February 1, 2006

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16 By: 
17 HONORABLE JEFFREY S. WHITE
18 United States District Judge
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